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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARCUS TURNER, an individual
Plaintiff,

vs.

HARVARD MEDTECH OF NEVADA, LLC,
a Nevada limited liability company;
KULDARSHAN S. PADDA, an individual,
Defendants.

Case No. 2:22-cv-01264-JDM-BNW

**JOINT STIPULATION TO EXTEND
TIME TO FILE PROPOSED AMENDED
DISCOVERY PLAN AND SCHEDULING
ORDER [ECF NO. 42]**

[First Request]

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and LR IA 6-1, the parties respectfully request that the Court approve this stipulation to extend the deadline of February 24, 2023 for the parties to submit a proposed amended discovery plan and scheduling order as set forth in the Court’s February 10, 2023, Order. (ECF No. 42). The parties request that the deadline be extended to and until 30-days after Plaintiff files an amended complaint. Currently, Plaintiff is expected to file an amended complaint on or before March 10, 2023.

The parties submit that good cause exists for this requested extension. This requested

extension is not made for purposes of delay but rather because Plaintiff's amended complaint is not due until March 10, 2023. (ECF No. 39). As such, the parties believe that it would be more prudent to discuss and propose an amended discovery plan and scheduling order after the filing of the amended complaint. The parties therefore respectfully request an extension of time to file a proposed discovery plan and scheduling order 30-days after Plaintiff files and amended complaint or no later than April 10, 2023.

Dated this 23rd day of February 2023.

NAYLOR & BRASTER

PAUL PADDA LAW, PLLC

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 24, 2023